

## **EXHIBIT N**

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

-----X

KHAN FUNDS MANAGEMENT AMERICA, INC.  
and XUEFENG DAI,

Plaintiffs,

-against-

AFFIRMATION  
OF  
SERVICE  
BY  
MAIL

NATIONS TECHNOLOGIES INC., NATIONS  
TECHNOLOGIES (USA) INC., YINGTONG SUN,  
ZHAOXUE LUO, BAOXIN HUANG, JUNJIE YU,  
and DOES 1-20,

Index No.: 153098/2022

Defendants.

-----X

STATE OF NEW YORK )  
                      ) SS.:  
COUNTY OF NASSAU )

KENNETH S. FERARU, ESQ., an attorney duly licensed to practice law in the Courts of the State of New York, under the penalty of perjury, pursuant to *Civil Practice Law and Rules Rule 2106*, upon information and belief, affirms the truth of the following:

I am not a party to this action, I am over the age of eighteen (18) years and I reside at NEW HYDE PARK, NEW YORK. On June 8, 2022, I served the within **LETTER TO JUDGE** by depositing a true copy thereof enclosed in a post-paid wrapper, in an official depository under the exclusive care and custody of the United States Postal Service within the State of New York, addressed to the following persons at the addresses set forth after the names: NATIONS TECHNOLOGIES INC., 3509 Langdon Common, Fremont, California 94538, NATIONS TECHNOLOGIES (USA) INC., 3509 Langdon Common, Fremont, California 94538, YINGTONG SUN, 3509 Langdon Common, Fremont, California 94538, ZHAOXUE LUO, 3509 Langdon Common, Fremont, California 94538, BAOXIN HUANG, 3509 Langdon Common, Fremont, California 94538, and JUNJIE YU, 3509 Langdon Common, Fremont, California 94538.

Dated: Garden City, New York  
June 8, 2022

  
KENNETH S. FERARU, ESQ.

**KENNETH S. FERARU**

ATTORNEY AT LAW

A PROFESSIONAL CORPORATION

1225 FRANKLIN AVENUE

SUITE 325

GARDEN CITY, NEW YORK 11530

**(516) 535-3333****FAX: (516) 535-4090**

KFERARUESQ@AOL.COM

June 8, 2022

DIANA D. FERARU  
OFFICE MANAGERADMITTED TO THE NEW YORK AND  
NEW JERSEY BARS

Honorable Justice Presiding  
Supreme Court, New York County  
60 Centre Street  
New York, New York 10007

Re: KHAN FUNDS MANAGEMENT AMERICA, INC. and XUEFENG DAI v. NATIONS TECHNOLOGIES INC., NATIONS TECHNOLOGIES (USA) INC., YINGTONG SUN, ZHAOXUE LUO, BAOXIN HUANG, JUNJIE YU, and DOES 1-20  
Index No.: 153098/2022  
Our File No.: 22D0191

Your Honor:

I am counsel to plaintiffs KHAN FUNDS MANAGEMENT AMERICA, INC. and XUEFENG DAI (collectively, "Plaintiffs") and write to advise the Court that defendant NATIONS TECHNOLOGIES (USA) INC. ("NATIONS USA") has defaulted with regard to Plaintiffs' verified complaint.

On May 5, 2022, defendant NATIONS USA was served process at its business address, registered with the California Secretary of State, of 3509 Langdon Common, Fremont, California 94538 (see, NYSCEF Doc. No. 7, Affidavit of Service). As set forth in Plaintiffs' proof of service of the summons and verified complaint upon NATIONS USA, process was delivered to the registered business address of NATIONS USA via personal service upon JIE LIANG; Mr. Liang holds dual employment with both NATIONS USA and defendant NATIONS TECHNOLOGIES INC. ("NATIONS") and is an officer and director of defendant NATIONS USA and vice general manager and agent of NATIONS. Thus, delivery of the summons and complaint upon him constitutes *prima facie* evidence of proper service pursuant to CPLR §311.

Accordingly, it is Plaintiffs' position that the deadline for defendant NATIONS USA to answer or move against Plaintiffs' verified complaint has now expired, and as NATIONS USA has neither answered nor moved nor obtained an extension of such deadline, NATIONS USA has defaulted with regard to Plaintiffs' verified complaint.

We write to further advise this Court that Plaintiffs

intend to file their motion forthwith pursuant to CPLR §3215 directing the entry of a default judgment on liability against defendants NATIONS USA with respect to the six causes of action alleged by Plaintiffs against NATIONS USA in the verified complaint, and scheduling an inquest to assess and determine the amount of damages in Plaintiffs' favor against NATIONS USA.

Thank you for your courtesies, efforts and attention in this matter.

Respectfully yours,

KENNETH S. FERARU, P.C.



Kenneth S. Feraru, Esq.

KSF:ksf

cc: NATIONS TECHNOLOGIES INC. (via regular mail)  
NATIONS TECHNOLOGIES (USA) INC. (via regular mail)  
YINGTONG SUN (via regular mail)  
ZHAOXUE LUO (via regular mail)  
BAOXIN HUANG (via regular mail)  
JUNJIE YU (via regular mail)